

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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GOLDIN AUCTIONS, LLC,	:	Case No. 13 Civ. 2816 (RMB/JS)
Plaintiff,	:	
	:	<u>Answer</u>
-against-	:	
	:	
KOBE BRYANT,	:	
	:	
Defendant.	:	
	:	
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Defendant Kobe Bryant (“Bryant”) by his attorneys, Loeb & Loeb LLP, as and for his Answer to Plaintiff Goldin Auctions, LLC’s (“Goldin”) Verified Complaint, states, upon information and belief, as follows:

Bryant submits this Answer pursuant to the directive of Hon. Renee M. Bumb issued at the hearing on May 14, 2013 in Camden, NJ. Bryant’s motion to dismiss for lack of personal jurisdiction remains *sub judice*, and Bryant’s submission of this Answer is without waiver of any defense asserted therein, or any other defense, claim, or counter-claim, all of which are expressly reserved. To the extent not specifically admitted, each and every allegation is denied.

1. There are no allegations in Paragraph 1. To the extent a response is deemed to be required, Bryant denies the allegations in Paragraph 1.

2. Denies the allegations contained in Paragraph 2.
3. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 3.
4. Admits the allegations contained in Paragraph 4.
5. Denies the allegations contained in Paragraphs 5, 6, and 7.
6. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraphs 8, 9, 10, 11, 12, 13, 14, 15, and denies the allegations in Paragraph 10 to the extent they allege communications between Kobe Bryant and Pamela Bryant.
7. Bryant respectfully refers the Court to the Press Release referenced in Paragraph 16 for a full and complete statement of its content.
8. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 17.
9. Admits the allegations contained in Paragraph 18 and respectfully refers the Court to the referenced April 30, 2013 letter for a full and complete statement of its content.
10. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 19 to the extent they allege communications between Kenneth Goldin and Pamela Bryant, and denies the allegations in

Paragraph 19 to the extent they allege communications between Kobe Bryant and Pamela Bryant.

11. Bryant repeats and incorporates by reference his responses to the allegations repeated and incorporated in Paragraph 20.

12. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 21.

13. Denies the allegations contained in Paragraph 22, except admits that Kobe Bryant is the legal owner of the sports memorabilia and that Goldin Auctions does not have the right to sell the memorabilia.

14. Denies the allegations contained in Paragraph 23, except admits that the sports memorabilia are one of a kind unique items that cannot be replaced.

15. Denies the allegations contained in Paragraphs 24 and 25.

16. Bryant repeats and incorporates by reference his responses to the allegations repeated and incorporated in Paragraph 26.

17. Denies the allegations contained in Paragraph 27, except admits that Goldin is seeking a declaratory judgment.

AND AS FOR A FIRST DEFENSE

18. Goldin fails to state a claim upon which relief can be granted.

SECOND DEFENSE

19. The Verified Complaint should be dismissed pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure on the ground that this Court lacks personal jurisdiction over Bryant.

THIRD DEFENSE

20. Goldin's claims have been asserted in an improper venue, and should be dismissed on this basis.

FOURTH DEFENSE

21. Goldin has adequate remedies at law and is therefore not entitled to any equitable relief.

FIFTH DEFENSE

22. Goldin's claims are barred, in whole or in part, for failure to join one or more necessary parties.

SIXTH DEFENSE

23. Goldin's claims are barred, in whole or in part, by the doctrine of unclean hands.

SEVENTH DEFENSE

24. Bryant has insufficient knowledge or information upon which to form a belief as to whether he may have additional, as yet unstated, separate

defenses. Bryant expressly reserves the right to assert additional affirmative defenses in the event discovery indicates that such defenses would be appropriate.

PRAYER FOR RELIEF

WHEREFORE, defendant Kobe Bryant hereby demands judgment dismissing Goldin's Verified Complaint in its entirety, with prejudice, and award to Kobe Bryant all costs and disbursements of this action, together with such other and further relief as this Court may deem just, proper and equitable.

Dated: May 24, 2013

LOEB & LOEB LLP

By: /s/ Jodi R. Sarowitz
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